TUESDAY THE 8TH OF MAY 2007

CHARLES JAY WOLFF
SOUTH DIVISION
281 NORTH STATE STREET
CONCORD, NEW HAMPSHIRE
03301

U.S. DISTRICT COURT
DISTRICT OF N.H.
FILED

2007 MAY 14 A 11: 26

GOOD MORNING MR JAMES R. STARR CLERK OF THE UNITED STATES DISTRICT COURT

RE: CHARLES JAY WOLFF
v.
NEW HAMPSHIRE
DEPARTMENT OF
CORRECTIONS.

CIVIL NO. 06-CV-321-PB
PLAINTIFFS PROPOSED DISCOVERY PLAN
FED. R. CIV. P. 26f.

DATE AND PLACE OF CONFERENCE: COURT ROOM #1 ON 5/14/2007

PLAINTIFF'S COUNSEL: CHARLES JAY WOLFF PRO SE

DEFENDANTS COUNSEL: ANDREW B. LIVERNOIS
ASSISTANT ATTORNEY GENERAL
N.H. DEPARTMENT OF JUSTICE
33 CAPITOL STREET
CONCORD, NH 03301

CASE SUMMARY

THEORY OF LIABILITY: ① THE NEW HAMPSHIRE DEPARTMENT OF CORRECTIONS VIOLATED MY PERSONAL CONSTITUTIONAL RIGHTS TO INCLUDE MY FIRST AMENDMENT, THE NEW HAMPSHIRE LAAMAN DECREE, ITEM #IV FOOD SERVICE, NEW

HAMPSHIRE ADMIN. RULE COR. 301.03 WITH STATUTORY AUTHORITY: RSA 21-H:13, RSA 622:44; RSA 651:2, AND THE UNIVERSAL DECLARATION OF HUMAN RIGHTS

(1) THE STATEMENTS (ALLEGATIONS) ARE FACT AND TRUE.

(2) THERE ARE NO IMMUNITIES OF DEFENDANTS UNDER UNITED STATES CODE, TITLE 42 SECTION 1983 AND TITLE 28 FEDERAL RULE.

(A) "COMMON LAW" - DEFENDANTS HAVE NO IMMUNITY FROM SUIT..."

(B) "THE PEOPLE"... WE THE PEOPLE WERE AND REPRESENTED IN CONGRESS. CONGRESS PASSED THE 1866 AND 1871 CIVIL RIGHTS ACTS SPECIFICALLY TO DEPRIVE ALL STATE OFFICIALS ANY IMMUNITY FROM SUIT.

(C) GRIEVANCE PROCESS HAS BEEN COMPLETED.

DAMAGES: PLAINTIFF IS SEEKING MONETARY DECLARATORY, INJUNCTIVE RELIEF, MONETARY COMPENSATION FOR MEDICAL MALPRACTICE DUE TO A VIOLATION OF MY KOSHER DIET IN CONJUNCTION WITH N.H. ADMIN RULE 301.03. BEING A DIABETIC WITH A HEART CONDITION.

JURISDICTIONAL QUESTIONS: N/A

QUESTION OF LAW: MY RIGHTS UNDER THE UNITED STATES CONSITUTION, THE NEW HAMPSHIRE STATE LAWS TO INCLUDE RSA COR. 301.03 HAVE BEEN VIOLATED

TYPE OF TRIAL: JURY TRIAL, UNLESS HIS HONOR MAGISTRATE JUDGE JAMES R. MUIRHEAD, DEEMS IT IS APPROPRIATE TO HAVE A BENCH TRIAL.

DISCOVERY

TRACK ASSIGNMENTS: STANDARD 12- MONTH TRACK FOR TRIAL ON OR BEFORE JUNE 2008.

DISCOVERY NEEDED: STANDARD DISCOVERY, TO INCLUDE THE DEPARTMENT OF CORRECTIONS OF THE STATE OF NEW HAMPSHIRE, RECORDS OF PURCHASE ORDERS, RECEIVING SLIPS, PHOTO COPIES OF ALL CHECKS TO PAY FOR ALL ITEMS PURCHASED WITH THE PURCHASE ORDER AND RECEIVING SLIPS, HOSPITAL RECORDS, DEPOSITIONS, INTERROGATORIES OF KEY WITNESS AND OTHER PARTIES.

MANDATORY DISCLOSURES: EXEMPT UNDER RULE 26(a) (1) (E).

ELECTRONIC INFORMATION DISCLOSURES (R. 26(f)): THE DEFENDANTS ATTORNEY ANDREW. B. LIVERNOIS MAY FORWARD TO EACH DEFENDANT A COPY OF ALL ELECTRONIC INFORMATION DISCLOSURES.

STIPULATION REGARDING CLAIMS OF PRIVILEGE/PROTECTION OF TRIAL PREPARATION MATERIALS (R. 26(f)): N/A

COMPLETION OF DISCOVERY: MAY 1ST 2008

INTERROGATORIES: A MAXIMUM OF 25 INTERROGATORIES BY THE PLAINTIFF AND 25 INTERROGATORIES BY EACH DEFENDANT. RESPONSES DUE 30 DAYS AFTER SERVICE UNLESS OTHERWISE AGREED TO PURSANT TO FED. R. CIV. P. 29.

REQUEST FOR ADMISSION: A MAXIMUM OF 30 REQUESTS FOR ADMISSIONS BY PLAINTIFF(S) AND 30 REQUESTS FOR ADMISSIONS BY EACH DEFENDANT. RESPONSES DUE 30 DAYS AFTER SERVICE UNLESS OTHERWISE AGREED TO PURSUANT TO FED. R. CIV. P. 29.

DEPOSITIONS: A MAXIMUM OF 10 DEPOSITIONS BY PLAINTIFF(S) AND 10 DEPOSITIONS BY EACH DEFENDANT(S). EACH DEPOSITION LIMITED TO A MAXIMUM OF 7 HOURS UNLESS EXTENDED BY AGREEMENT OF THE PARTIES.

DATES OF DISCLOSURE OF EXPERTS' WRITTEN REPORTS: PLAINTIFF(S) DECEMBER 15TH 2007
DEFENDANTS DECEMBER 15TH 2007

IN PLACE OF AN EXPERT WRITTEN REPORTS A NOTARIZED AFFIDAVITS UNDER OATH WILL BE ACCEPTABLE.

CHALLENGES TO EXPERT TESTIMONY ON THAT OF

(1) A WRITTEN AFFIDAVIT THAT IS UNDER OATH AND NOTARIZED.

(2) COURT RECORDS OF THIS SUIT.

(3) ANY NEW COURT RECORDS OF THIS SUIT TO BE FILLED WITH THE UNITED STATES DISTRICT COURT.

NO LATER THAN 45-DAYS PRIOR TO TRIAL.

OTHER ITEMS

JOINDER OF ADDITIONAL PARTIES:

PLAINTIFF: OCTOBER 1ST 2007

DEFENDANT: OCTOBER 1ST 2007

THIRD PARTY ACTIONS: ALLOWED

AMENDMENT OF PLEADINGS:

PLAINTIFF: SEPTEMBER 1ST 2007

DEFENDANTS: SEPTEMBER 1ST 2007

DISPOSITIVE MOTIONS:

TO DISMISS: OCTOBER 1ST 2007.

FOR SUMMARY JUDGMENT - MARCH 1ST 2008.

SETTLEMENT POSSIBILITIES: "POSSIBLE, (1) PROPER KOSHER DIET THAT I CAN CONSUME TO KEEP ME IN GOOD HEALTH AT APX 160 POUNDS ACCORDING TO N.H. ADMIN RULE 301.03.

(2) THE DEPARTMENT OF CORRECTIONS OF THE STATE OF NEW HAMPSHIRE FOLLOW N.H. ADMIN RULES, TO INCLUDE N.H. RULE COR 301.03 TO THE LETTER OF THE LAW FROM

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LETTER "A" THROUGH "N".

3. THE DEPARTMENT OF CORRECTIONS OF THE STATE OF NEW HAMPSHIRE PAY ALL COSTS THE UNITED STATES DISTRICT COURT TO INCLUDE THE UNITED COSTS AND ALL MY COSTS PLUS REASONABLE AMOUNT IN PUNITIVE DAMAGES AND ANY OTHER RELIEF THAT IS FAIR AND JUST.

MEDIATION: I AM NOT OPPOSSED TO NON-BINDING MEDIATION OR AGREEMENT.

WITNESSES AND EXHIBITS: AS REQUIRED BY THE RULES REGARDING FINAL PRE-TRIAL PROCEDURES.

TRIAL ESTIMATE: 5 TO 10 DAYS

TRIAL DATE: AS SET BY THE UNITED STATES DISTRICT COURT 55 PLEASANT STREET CONCORD, NH 03301

PRELIMINARY PRETRIAL CONFERENCE: IS REQUESTED BY THE PLAINTIFF ON 5/14/2007.

OTHER MATTERS: ALL FEDERAL AND STATE LAWS BE RESPECTED AND APPLIED FOR THE CARE OF ALL INMATES IN THE NEW HAMPSHIRE STATE PRISON SYSTEM CALLED THE DEPARTMENT OF CORRECTIONS.

RESPECTFULLY,

Charles J Wolff

CHARLES JAY WOLFF

CERTIFICATE OF SERVICE

I HERE BY CERTIFY THAT A COPY OF THE FOREGOING WAS MAILED THIS DAY, POSTAGE PREPAID.

TO ATTORNEY FOR THE DEFENDANTS
ATTORNEY ANDREW B. LIVERNOIS ESQ
ASSISTANT ATTORNEY GENERAL
NEW HAMPSHIRE DEPARTMENT OF JUSTICE
33 CAPITOL STREET
CONCORD, N.H. 03301